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Attorney for Defendant Topcon Positioning Systems, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Hydro Net LLC,

Plaintiff;

v.

Topcon Positioning Systems, Inc.,

Defendant.

Case No. 5:20-cv-06116-LHK

**Second Joint Stipulated Motion to
Extend Time for Defendant to
Respond to Plaintiff's Complaint**

The parties stipulate and jointly move to extend the time for Defendant Topcon Positioning Systems, Inc. to answer or otherwise respond to Plaintiff Hydro Net LLC's Amended Complaint for an additional 30 days, through and including November 25, 2020.

RECITALS

1. On August 31, 2020, Plaintiff filed a Complaint in this court against the Defendant.
2. The Complaint was served on Defendant on September 4, 2020.
3. Plaintiff filed an Amended Complaint on September 21, 2020.
4. The parties previously agreed and jointly moved to extend Defendant's time to file a response to the Amended Complaint until October 26, 2020.

5. New counsel for Defendant filed a notice of appearance on October 20, 2020, and former counsel intends to withdraw as counsel.
6. The parties agree that a 30-day extension for Defendant to respond to the Amended Complaint is appropriate to allow Defendant's new counsel to review the allegations of the Amended Complaint and to respond to it.
7. No party will be prejudiced by this brief extension nor will the extension impact the Court's case management conference set for January 6, 2021.

STIPULATED MOTION

Based on the foregoing, the parties jointly move to extend the time for Defendant Topcon Positioning Systems, Inc. to answer or otherwise respond to Plaintiff Hydro Net LLC's Amended Complaint for an additional 30 days, through and including November 25, 2020.

Dated: October 23, 2020

Respectfully submitted,

MASCHOFF BRENNAN

INSIGHT PLC

By: /s/ Jared J. Braithwaite

By: /s/ Steven W. Ritcheson

Jared J. Braithwaite

Steven W. Ritcheson

Attorney for Defendant

Attorney for Plaintiff

(signed with permission by filing attorney)

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~~[Proposed]~~ Order Granting
Second Joint Stipulated Motion to
Extend Time for Defendant to
Respond to Plaintiff's Complaint

Pursuant to the parties' stipulation and motion to extend the time for Defendant Topcon Positioning Systems, Inc. to answer or otherwise respond to Plaintiff's Amended Complaint, **IT IS HEREBY ORDERED** that Topcon Positioning Systems, Inc.'s deadline to answer or otherwise respond to Plaintiff Hydro Net LLC's Amended Complaint is extended by 30 days, through and including November 25, 2020.

Dated: October 26, 2020

By:



Honorable Judge Lucy H. Koh
United States District Judge